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Hearing Date and Time

December 19, 2019 at 11:00 a.m.

*Attorneys for Counsel Financial Financial II LLC,
LIG Capital LLC, and Counsel Financial Holdings LLC*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
: :
JEFFREY LEW LIDDLE, : Case No. 19-10747 (SHL)
: (Jointly Administered with Case No. 19-12346)
Debtor. : Related Doc. 249, 250 and 257
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In re: : Chapter 11
: :
LIDDLE & ROBINSON, L.L.P., : Case No.19-12346(SHL)
: (Jointly Administered with Case No. 19-12346)
: Related Doc. 103, 130 and 155
Debtor. :
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**DECLARATION OF GLENN PHILLIPS IN FURTHER SUPPORT OF
MOTION BY COUNSEL FINANCIAL II LLC, LIG CAPITAL LLC, AND
COUNSEL FINANCIAL HOLDINGS LLC, PURSUANT TO § 1112(b) OF
THE BANKRUPTCY CODE, TO CONVERT THIS CHAPTER 11
REORGANIZATION TO A CHAPTER 7 LIQUIDATION**

GLENN PHILLIPS, declares under 28 U.S.C. §1746:

1. I am a member of the Washington State Bar and the managing partner of Milberg Phillips Grossman LLP, the successor firm to the nationally known Milberg Weiss firm. I have been practicing law since 1985 and I have tried numerous civil jury trials. I have developed a nationally recognized expertise in mass tort cases, especially pharmaceutical litigation, with a

current inventory of over 15,000 cases. I have been a frequent speaker before such national groups as the National Trial Lawyers, American Association for Justice, Mass Torts Made Perfect, as well as various state trial lawyer groups.

2. I also have an extensive background working with financial lenders in the context of capitalizing law firms. I have counseled lenders about the business of law firm operations and how it relates to law firms engaged in mass tort or other aggregate litigations.

3. I have also been involved in the merger of law firms.

4. In paragraph “20” of his declaration, Liddle claims that “Counsel Financial attempted to force the transfer of Liddle & Robinson’s cases to other firms, including three times to Milberg LLP (“Milberg”). Liddle also states, in paragraph 29, that Counsel Financial tried “to induce” him to combine his firm with Milberg. Nothing could be further from the truth. No one at Counsel Financial ever tried, to my knowledge, to force Liddle’s law firm, Liddle & Robinson, LLP (“L&R”) to combine with Milberg or transfer L&R’s cases to Milberg.

5. In 2017, when L&R was struggling, Felice Callahan, one of the founders of Counsel Financial, approached me about a possible merger with L&R. She spoke highly of Mr. Liddle and his firm, and so I told her I would consider bringing Mr. Liddle and his practice to Milberg.

6. Over the course of many months, I had numerous meetings, discussions and communications with both Mr. Liddle and his attorney, Les Corwin, Esq. We discussed many possibilities, including Milberg taking over the space leased by L&R. At times, Mr. Liddle seemed very engaged in the process, while other times extended periods would go by without any communication from him or his attorney.

7. In or about June/July of 2018, we had a meeting that was also attended by Ms. Callahan. During this meeting, it became clear to me that Mr. Liddle and I would not be able to work well together and I then decided to disengage from further discussions.

Executed this 17th day of December, 2019

/s/ Glenn Phillips
GLENN PHILLIPS